## REMARKS

### I. Status of the Claims:

Claims 1-20, 23-34 and 41-52 are currently pending. Applicants note that claims 21 and 22 were previously canceled without prejudice or disclaimer, and respectfully request re-entry of the cancellation of those claims, if not entered.

By this Preliminary Amendment, claims 1 and 11 have been amended. No new matter has been added by this amendment. Entry of this Amendment before examination on the merits is respectfully requested.

A Request for Continued Examination (RCE) and Extension of Time are submitted concurrently herewith.

### II. Rejection Under 35 U.S.C. §§102 and 103:

Claims 1, 3-10, 11, 13-20, 49 and 52 have been rejected under 35 U.S.C. §102(b) as being anticipated by Sergeant et al. (U.S. Patent No. 5,517,236). Claims 2, 12, 21-22 and 47-52 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sergeant and further in view of WebCam+ and RFC 1866 "Hypertext Markup Language – 2.0" and RFC 1738 "Uniform Resource Locators (URL)." Claims 23-34 and 41-46 are rejected under 35 U.S.C. §103(a) as being unpatentable over Blackshear (U.S. Patent No. 5,111,288) in further view of WebCam+ and Niwa (U.S. Patent No. 5,544,046). Applicants respectfully traverse the rejection of these claims, for the reasons set forth below.

#### 1. CLAIMS 1 AND 11:

Claims 1 and 11, as amended are directed to an arrangement in which both a network address of a site and control information for respective image input means of a site are

57857 v1

stored at a location remote from the object site. The stored network address and control information are read. The designated site is accessed using the read address and is controlled using the read control information.

That is, prior to access and control of the designated site, network address and control information are stored at a location remote from the object site and subsequently read for use in access and control operation. Thus, the storing of network address and control information and the reading thereof are <u>not</u> performed locally at the designated site.

Sergeant does not disclose or suggest that the control information is stored remote from the site. Instead, the Sergeant system maintains control information locally at each surveillance unit for subsequent implementation. The Examiner appears to acknowledge this fact. Accordingly, Sergeant does not disclose or suggest the claimed combination of storing network address and control information for a site at a location remote from the object site, reading the address and associated control information, and then accessing and controlling the site according to the stored and read address and associated control information. Thus, claims 1 and 11 and their dependent claims are not anticipated by Sergeant.

As to the Examiner's response to Applicants' arguments set forth on page 2 of the Office Action (which allege obviousness of these claims in further view of bookmark or shortcut), claims 1 and 11 have only been rejected under section 102 as being anticipated by Sergeant and not under section 103. <u>See</u> Office Action, page 3. However, since a feature of Sergeant is to store control information at the designated sites, Applicants respectfully submit that one of ordinary skill in the art would not modify Sergeant in the manner suggested by the Examiner.

57857 v1

## 2.  CLAIMS 23, 30 AND 31:

Independent claims 23, 30 and 31 are directed to an arrangement involving transferring image information <u>with</u> information indicative of a service allowable range of the camera based on a received request.

Applicants continue to disagree with the Examiner that the cited references disclose or suggest information indicative of a service allowable range.  As previously argued, Blackshear and WebCam+ do not disclose or suggest any information indicative of a service allowable range of a camera or any transfer thereof.  Niwa is directed to a numerical controller unit for controlling a machining process, which is simply different from the camera control arrangement of the claimed inventions.  In Niwa, an operator may provide memo data to define tolerance limits (e.g., an upper and lower limit) for particular data which is employed by a machining program to perform a machining process.  The tolerance limits are simply not information indicative of a service allowable range of a camera.  Thus, the cited references, individually or in combination, do not disclose or suggest any information indicative of a service allowable range of a camera.

The cited references are also silent as to the transfer of image information <u>with</u> information indicative of a service allowable range of a camera based on a received request.  The Examiner appears to rely on the combination of Blackshear and Niwa as teaching this transfer feature.  <u>See</u> Office Action, page 7.  However, Blackshear simply describes display of image signals and status information (e.g., GOING TO PRESHOT, etc.).  The status information is simply <u>not</u> information indicative of a service allowable range of a camera.  Niwa, as described above does not disclose or suggest any information indicative of a service allowable range.

Thus, the Examiner's rationale set forth on page 8 for combining the references to read on the transfer feature is simply conclusory and subjective based on an arbitrary piecemeal reading of the cited references. See Office Action, page 8 ("Given the teaching of Niwa, it would have been obvious . . . ."). Again, it is apparent that absent impermissible hindsight, one of ordinary skill in the art would not combine the references in the manner suggested by the Examiner.

Thus, the references, individually or in combination, still do not disclose or suggest the transfer of image information with information indicative of a service allowable range of a camera based on a received request. In view of the foregoing, claims 23, 30 and 31 are believed to be patentably distinguishable over the cited references.

### 3.    CLAIMS 32, 33 AND 34:

Claims 32, 33 and 34 are directed to an arrangement involving comparing information indicative of the operable limitation of the camera transferred from the server based on a request and notifying the result of the comparison. The comparison is not performed by the server, but rather at a remote location.

For similar reasons as discussed above for claims 23 and 31, the cited references do not disclose or suggest any information indicative of the operable limitation of a camera or the transfer thereof.

Further, Applicants previously argued that the cited references do not disclose or suggest the claimed comparing operation. The present Office Action, however, does not adequately adress those prior arguments as to the Examiner's contention and omits any discussion of how this claimed feature is taught by the references. Thus, the Office Action does

57857 v1

not address with any reasonable particularity how the cited references are being relied upon to read on the comparing feature.

As previously argued, Niwa simply shows a numerical controller arrangement which is simply different than the claimed environment with a client, server, camera and general network. The Examiner has not addressed with reasonable particularity what is alleged as the client or server in Niwa and which systems or components perform processes described in Fig. 49. Blackshear (e.g., Fig. 9) describes processes performed by a program within the on-board computer that controls the camera functions through the electronic control circuit and not within a "client". See col. 9, lines 31-35. Thus, the Examiner's allegations are further based upon incorrect or unsupported assumptions.

For these reasons, claims 32, 33 and 34 are believed to be distinguishable over the cited references.

### 4. CLAIM 21:

Claims 21 and 22 were previously canceled without prejudice or disclaimer, rendering the rejection of these claims moot.

### 5. DEPENDENT CLAIMS 47, 48, 50 and 51:

Dependent claims 47, 48, 50 and 51 each recite one of the following: (1) the identifier is expressed as part of a path name in the URL, or (2) the identifier is expressed as part of a resource name in the path name in the URL. As noted in the base claims, the identifier identifies an item to be controlled by said image input means.

57857 v1

The Examiner continues to assert that these limitations are somehow taught by the references RFC 1866 and RFC 1738. However, RFC 1866, as relied upon by the Examiner, simply discusses a GET method in which a form data set is appended to the action URL. See RFC 1866, pages 46-47. The appended data set is not part of the path name of the URL or the resource name. In other words, the path or resource name or parts thereof are not employed as the claimed identifier for identifying the item to be controlled. As to RFC 1738, the Examiner points to a general discussion of HTTP syntax and GOPHER URL syntax which do not disclose or suggest the identifier being expressed as part of a path name or resource name in the URL. See RFC 1738, pages 9-10.

In particular, the Examiner simply concludes that:

It is known in the art that Web request is URL encoded with the network address, path, resource name and optional parameters' [see RFC 1866 pp. 46-47 and RFC 1738 pp.2, 9-10]. It is known to encoded parameters within the path or resource name of the URL [see RFC [1738] pp.9-10 sections 3.3, and 3.4.1] See Office Action , pages 5-6.

Contrary to the Examiner's conclusory opinion, the cited portions of RFC 1866 and 1738 do not disclose any encoding of parameters, particularly the claimed identifier, within the path or resource name of the URL. For example, as taught in RFC 1866. information may simply be appended to the URL string without being part of the pathname or resource name.

Further, although the URL syntax of RFC 1738 in section 3.3 may include a pathname and/or resource name, there is nothing in this section of RFC 1738 to support the Examiner's subjective classification of the entire <path>?<searchpart> fields as a resource name or pathname or that control information would be part of a pathname or resource name. It is

57857 v1

apparent that absent impermissible hindsight, one of ordinary skill in the art would not combine

the references in the manner suggested by the Examiner.

For these reasons, claims 47, 48, 50 and 51 are believed to be further

distinguishable over the cited references.

## CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

## AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4367US1.
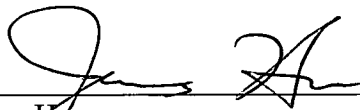
In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4367US1.

Respectfully submitted,
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Dated: 2/22/05

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57857 v1